

Immunization Program Revision and Update of Chapter 246-100 WAC

Immunization of Child Care and School Children against Certain Vaccine Preventable Diseases

State Board of Health Hearing – July 13, 2005

Public Comments

TOPIC	COMMENTS/QUESTIONS	RECEIVED FROM	DOH RESPONSE
Error in professional title	Section 4 (A) doctor of osteopathy is a D.O not an O.D. as in the WAC approved by the SBOH 4/9/05 and effective 5/2/05	6/1/05 Carolyn Lokkins, RN Public Health Nurse Island County Health Department	Change O.D to D.O
Support for WAC change	As Chair of the Immunization Action Coalition of WA (IACW), I am all in favor of the WAC changes necessary to add varicella vaccine to day care and school entry requirements. Even though our varicella immunization rates have increased considerably in the last few years, our rates are still behind those of most other states. IACW has facilitated articles promoting varicella immunization in several health care provider journals and we will continue to help with the education process of providers and parents in any way we can. I hope that the timeline for the WAC change will occur before September, 2005. Please let me know of anything that IACW can do to facilitate this process	4/1/05 Cynthia Shurtleff Executive Director Healthy Mothers, Healthy Babies Chairperson Immunization Action Coalition of Washington	Informed commenter of opportunities to participate in public discussion, such as the Vaccine Advisory Committee meeting on 4/14 and SBOH hearings on 5/11 and 7/13.

Public Comments on Proposed Revision of WAC 246-100-166

Immunization of Child Care and School Children against Certain Vaccine Preventable Diseases

State Board of Health Hearing – July 13, 2005

TOPIC	COMMENTS/QUESTIONS	RECEIVED FROM	DOH RESPONSE
Implementation	Will the varicella immunization requirement be phased-in? I feel it should be. Perhaps the phase-in plan, used when the Hepatitis B immunization series was established as a requirement, could be used.	6/9/05 Carleen DeGallier Health/Nutrition Specialist LCC Head Start/ ECEAP	Decisions about implementation will be made after the July 13, 2005 SBOH hearing. The Department will work with schools to develop an implementation plan.
Implementation	The only way this will work is to make it a kindergarten requirement 8/06 and continue increasing a grade level each year.	6/9/05 Original message sent to Janice Doyle. Response made by designee: Mary Jo Wilkins, RN Kennewick School Nurse	Decisions about implementation will be made after the July 13, 2005 SBOH hearing. The Department will work with schools to develop an implementation plan.
Documentation	I would hope there is an easy way for parents to sign that their children have had varicella infection and therefore do not need the vaccine. I anticipate there will be significant resistance from parents who do not want this vaccine made mandatory, whether their children have had the disease or not.	6/13/05 Lyell Fox Clallam County	WAC draft language states that documentation by the parent that a child has a history of varicella is one way to demonstrate immunity in addition to receiving the vaccine or serologic tests. There have been no modifications to exemption policy at this time.

Contact: Janna Bardi, Immunization Program Manager, 360-236-3568 or janna.bardi@doh.wa.gov

Public Comments on Proposed Revision of WAC 246-100-166

Immunization of Child Care and School Children against Certain Vaccine Preventable Diseases

State Board of Health Hearing – July 13, 2005

TOPIC	COMMENTS/QUESTIONS	RECEIVED FROM	DOH RESPONSE
Implementation	I support this change to add varicella to the required immunizations. My concerns are about having guidelines for implementing the change from the state. Whenever this change goes into effect we need to have assurance that providers are on the same page and are following this new requirement. There will also need to be some time to make sure all children get this immunization that have not yet received it at their last scheduled appointment.	6/10/05 Jennifer Weiss-Standley Health/Nutrition Program Manager EPIC Head Start	Draft WAC language has been sent to health care providers through the state Vaccine Advisory Committee, the Washington Chapter of the American Academy of Pediatrics and the Washington Chapter of the American Academy of Family Practitioners. It has also been sent to local health jurisdictions. Local health jurisdictions distribute new information to all providers who receive public-purchased vaccine.
Inclusion of preschool clarification	I see no problems with these. It's a good idea as far as I can tell. I did talk to a preschool owner this week and she indicated she didn't think that the immunization requirements applied to preschools and though she could request them, there didn't seem to be an enforcement mechanism like in the public schools. My reading of the WAC is that preschools are included in the definition of schools – but it's buried towards the end. It might be helpful if (2) (c) (i) and (2) (c) (ii) could specify preschools also.	6/9/05 Original message sent to DOH School Health Team. Response made by: Nancy P. Bernard, MPH School Health and Safety Program Office of Environ. Health & Safety Division of Environmental Health WA Dept. of Health	DOH will take this into consideration in a future WAC revision. An additional subsection (an "iv") under Section 2b specifically for preschools may be helpful.

Contact: Janna Bardi, Immunization Program Manager, 360-236-3568 or janna.bardi@doh.wa.gov

Public Comments on Proposed Revision of WAC 246-100-166

Immunization of Child Care and School Children against Certain Vaccine Preventable Diseases

State Board of Health Hearing – July 13, 2005

TOPIC	COMMENTS/QUESTIONS	RECEIVED FROM	DOH RESPONSE
National immunization requirement	As many of the states already require varicella for school entry, I do believe this is something that Washington state should also do. It would be nice if a national immunization requirement could be developed and followed by all states to increase the coverage for all.	6/14/2005 Patty Bowles Garfield County	The State Board of Health has the authority under statute to adopt rules regarding immunization requirements for schools and child care centers. The federal government has left it to the individual states to decide what vaccines are mandatory for school attendance.

Contact: Janna Bardi, Immunization Program Manager, 360-236-3568 or janna.bardi@doh.wa.gov